

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

STATE OF NEW JERSEY,

*Plaintiff,*

v.

UNITED STATES DEPARTMENT OF  
TRANSPORTATION, FEDERAL HIGHWAY  
ADMINISTRATION, SHAILEN BHATT, in his official  
capacity as Administrator of the Federal Highway  
Administration, and RICHARD J. MARQUIS, in his  
official capacity as Division Administrator of the New  
York Division of the Federal Highway Administration,

*Defendants,*

and

THE METROPOLITAN TRANSPORTATION  
AUTHORITY, *et al.*,

*Defendant-Intervenors.*

Civil Action No. 23 Civ. 03885

Hon. Leo M. Gordon

**CERTIFICATION OF CYNTHIA LOVINGER SIDERMAN IN SUPPORT OF  
PRO HAC VICE APPLICATION**

Cynthia Lovinger Siderman, under penalty of perjury, declares:

1. I am admitted to practice law in the States of New Jersey and New York and am an Associate with Kramer Levin Naftalis & Frankel LLP, counsel for *amici curiae* Environmental Defense Fund, New York League of Conservation Voters, Tri-State Transportation Campaign, Riders Alliance, Open Plans, Real Estate Board of New York, New York Lawyers for the Public Interest, WE ACT for Environmental Justice, StreetsPAC,

Transportation Alternatives, New York Public Interest Research Group Fund, and Michael B. Gerrard (collectively, “*amici*”) in connection with this action. I submit this Certification in support of the *pro hac vice* admission of Dror Ladin, Esq., who is an attorney at Earth Justice, to appear *pro hac vice* as counsel for *amici*.

2. I am a member in good standing of the New Jersey Bar and the United States District Court for the District of New Jersey and am authorized to file through the Court’s electronic filing system.

3. Mr. Ladin is familiar with the facts of this action and has experience in the field of law relevant to this action.

4. As set forth in the accompanying Certification of Dror Ladin (“Ladin Certification”), he is a member in good standing in the jurisdiction in which he has been admitted to practice. There are no disciplinary proceedings pending against Mr. Ladin and no discipline has been imposed on him in any jurisdiction.

5. As set forth in the Ladin Certification, in the event that he is admitted *pro hac vice* in this action, he will comply with all the requirements of L. Civ. R. 101.1.

6. Upon admission *pro hac vice* of Mr. Ladin, I will continue to serve as counsel of record in this matter and will comply with all of the requirements of L. Civ. R. 101.1. As counsel of record, I will continue to be responsible for the conduct of Mr. Ladin and I will continue to file all papers, enter appearances for parties, sign stipulations, and sign or receive payments on judgments, decrees, or orders.

7. For the foregoing reasons, I respectfully request that this Court enter an Order admitting Mr. Ladin to appear *pro hac vice* before this Court for all further proceedings in this matter.

8. I declare under penalty of perjury that the foregoing is true and correct.

Dated: January 2, 2025  
New York, New York

Respectfully submitted,

By: /s/ Cynthia Lovinger Sideman  
Cynthia Lovinger Sideman (N.J. 027732001)  
csideman@KRAMERLEVIN.com

KRAMER LEVIN NAFTALIS & FRANKEL LLP  
1177 Avenue of the Americas  
New York, NY 10036  
Phone: 212-715-9100  
Fax: 212-715-8000

*Attorneys for Amici Curiae Environmental Defense  
Fund, New York League of Conservation Voters,  
Tri-State Transportation Campaign, Riders  
Alliance, Open Plans, Real Estate Board of New  
York, New York Lawyers for the Public Interest, WE  
ACT for Environmental Justice, StreetsPAC,  
Transportation Alternatives, New York Public  
Interest Research Group Fund, and Michael B.  
Gerrard*